

CEI _____
CSI _____
Complaint _____
Spill _____
Other ☒ _____
Sampling _____

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF WATER RESOURCES
WATER POLLUTION CONTROL DIVISION

WP 1865
File Location
N/A.
Log # Reference

FACILITY INSPECTION FORM

INSPECTION DATE: 5/11/92 TIME IN: 0758 hrs
COMPANY NAME: Greenhill Petroleum
FACILITY NAME: Bully Camp Field
TYPE OF FACILITY: Oil Production PHONE #: ()
COMPANY ADDRESS: _____

FACILITY REPRESENTATIVE: MS. Pamela Grantham TITLE: _____
FACILITY LOCATION: Point-auchien WMA

PARISH: Lafourche BASIN/SEGMENT: 1206
PERMIT #'S: NPDES: _____ LWDPs: WP1865 GP: _____

EFFLUENT _____ OPERATION & MAINTENANCE _____ SAMPLING PROCEDURES _____
RECORDS AND REPORTS _____ COMPLIANCE SCHEDULE _____ LABORATORY PRACTICES _____
PERMIT VERIFICATION _____ FLOW MEASUREMENTS _____ OTHER _____

INSPECTOR'S OBSERVATIONS, PROBLEMS, REMARKS, VERBAL COMMITMENTS FROM FACILITY REPRESENTATIVES:

Purpose of visit was to assist EPA, Wash office and contractors with a sampling effort at this facility to gather data for development of guidelines. Attendees: Kerry St. Pe + Greg Breau (DEQ), Ryan Childs (EPA), John Sunda and Susan Roman (SAIC-Contractors), Pearly Broussard (Greenhill), Pam Grantham (Greenhill), David Freeman (Greenhill).
0800 hrs - Meeting on site w/ Facility rep. Discussed purpose of sampling and safety procedures.
0850 - Begin sampling before and after filter (Produced water).
1700 hrs - Completed sample collection. Begin packing samples.

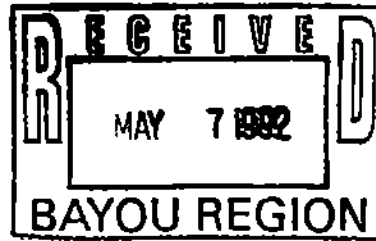
PHOTOGRAPHS TAKEN: Yes SAMPLES TAKEN: Yes FACILITY ACCEPTED SPLIT SAMPLES: Yes
(EPA Contractors)
FACILITY F.I.F. COPY RECEIVED BY: SIGNATURE (X) _____ N/A.

TITLE _____
TIME OUT: _____ INSPECTOR'S SIGNATURE Kerry M. St. Pe

DEQ/OWR/WPCD-3 WHITE COPY - MAIN OFFICE PINK COPY - FACILITY REPRESENTATIVE
(Rev. 09/01/90) YELLOW COPY - COMPLIANCE ASSURANCE SECTION GOLD COPY - REGIONAL OFFICE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
WATER

May 1, 1992

Ms. Betty Brousseau, Surveillance Program Manager
Louisiana Dept. of Environmental Quality
Water Pollution Control Div.
11720 Airline Hwy
Baton Rouge, LA 70817

Dear Ms. Brousseau:

This letter is to apprise you of the EPA's data collection efforts for the coastal subcategory of the Oil and Gas Extraction industry. We plan to conduct sampling visits at oil and gas production facilities in southern Louisiana as part of this program, therefore, we wish to inform you of our plans.

The Clean Water Act of 1977, as amended, requires the Environmental Protection Agency (EPA) to promulgate effluent limitations for all point source industrial categories. One such category is the oil and gas industry. We are in the process of developing these regulations for the coastal oil and gas industry, most of which is located in the coastal areas of the Gulf of Mexico. Part of this regulation development effort involves characterizing wastestreams and investigating treatment and disposal methods for these wastes.

Allison Wiedeman of my staff and Ryan Childs of EPA's Standards and Applied Sciences Division have been in contact with Kerry St. Pe of your field office in Lockport over the past year. Mr. St. Pe has been generous enough to have given them a tour of oil and gas operations in the wetlands in Lafourche Parish, and his staff has accompanied them on two recent site visits to commercial produced water disposal facilities. Our next visit is planned for May 11 and 12, where Ryan Childs and our contractors SAIC will conduct a sampling effort at two oil and gas production batteries located again in Lafourche Parish. Mr. St. Pe will also be attending them during these visits. The letters to the facilities are attached.

We are grateful for the DEQ's cooperation and assistance with our effort. Please feel free to call me if you would like to discuss this program further at 202-260-7124.

Sincerely,

A handwritten signature in black ink, appearing to read 'Marvin Rubin', with a long, sweeping horizontal stroke extending to the right.

Marvin Rubin, Chief
Energy Branch
Engineering and Analysis Division

cc: Kerry St. Pe



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
WATER

Ms. Pamela Grantham
Greenhill Petroleum
3300 W. Esplanade, Suite 500
Metairie, LA 70002

APR 23 1992

Dear Ms. Grantham:

As discussed between yourself and Mr. Ryan Childs of my staff, the EPA is requesting your company's participation in the Engineering and Analysis Division's data collection efforts.

The Clean Water Act of 1977, as amended, requires the Environmental Protection Agency (EPA) to publish wastewater effluent limitations guidelines and standards for various industries. Published by industrial categories, these guidelines and standards are the basis for permit requirements controlling the discharge of pollutants either into navigable waters or to publicly-owned treatment works (POTW). EPA is currently developing regulations for the Coastal Subcategory of the Oil and Gas Industry.

The Engineering and Analysis Division (EAD) is collecting information on facility waste stream characteristics, facility operation, and facility waste management practices in order to develop regulations for the Coastal Oil and Gas Industry. This information is being obtained by surveying coastal oil and gas facilities and sampling selected waste streams. EPA is authorized by Section 308 of the Clean Water Act to request a facility's participation in the Agency's field investigation program. It is important to note that this effort is not for an EPA assessment of compliance with existing permits.

A sampling visit has been tentatively scheduled at your Bully Camp Oil and Gas Field facility in Lafourche Parish for Monday, May 11. During this visit, Mr. Childs will be glad to describe the Coastal Oil and Gas rulemaking project, outline the overall project objectives and schedule, and discuss sampling activities. As part of the sampling visit, we will appreciate the opportunity to speak with your operations manager in order to obtain technical and cost information regarding produced water treatment and disposal.

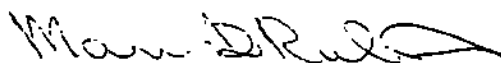
As discussed in Mr. Childs' telephone conversation with you, we intend to sample certain waste streams associated with produced water treatment prior to injection. In particular, we would like to obtain grab samples of the filter sludges and the produced water before and after filtration. In addition, we would also like to make arrangements for obtaining a spent filter, where possible, for analysis. The samples will be shipped to EPA contractor laboratories to be analyzed for various analytes including radioactivity, metals, and organic compounds. We envision the sampling of the produced water to consist of grab samples collected every hour over an eight hour time period. For your information, we will provide you a generic sampling plan which describes EPA's objectives and activities in this effort. This will be sent to you, along with additional logistical details pertaining to your site, prior to the sampling visit.

I have enclosed a statement that explains your obligations under Section 308 and the legal rights to the protection of confidential information (Attachment A). If you believe the information obtained by analyzing wastewater samples or any other information that you provide is confidential, you should follow the confidential claim procedure discussed in the enclosed statement. Attachment B is a statement explaining our intention to allow selected contractors access to any confidential information you may submit in response to this request. As also noted in Attachment B, if you wish to comment on this intention, any such comment should be submitted to Ms. Allison Wiedeman, the Coastal Oil and Gas project officer on my staff, at the address below within 5 days of this notice.

Ms. Allison Wiedeman
Engineering and Analysis Division (WH-552)
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

We greatly appreciate your cooperation on this project. Should you have any questions about our study, please contact Allison Wiedeman at (202) 250-7179 or Ryan Childs at (202) 260-7035.

Sincerely yours,



Marvin Rubin, Chief
Energy Branch
Engineering and Analysis Division

Enclosures

ATTACHMENT A

AUTHORITY AND CONFIDENTIALITY

This request for information is made under authority provided by Section 308 of the Clean Water Act, 33 U.S.C. § 1318 (CWA), and Section 3007 of the Resource Conservation and Recovery Act of 1976, as amended 42 U.S.C. § 6927 (RCRA). Section 308 provides that: "Whenever required to carry out the objective of the Act, including but not limited to . . . developing or assisting in the development of any effluent limitation . . . pretreatment standard, or standard of performance under this Act" the Administrator may require the owner or operator of any point source to establish and maintain monitoring equipment, sample effluents, and provide "such other information as he may require." In addition, the Administrator or his authorized representative, upon presentation of credentials, has right of entry to any premise where an effluent source is located or where records which must be maintained are located and may at reasonable times have access to and copy such records, inspect monitoring equipment, and sample effluents. Section 3007 of RCRA authorizes the Administrator or a designated officer or employee of EPA "(1) to enter at reasonable times any establishment or other place maintained by any person where hazardous wastes are generated, stored, treated, disposed of, or transported from, [and/or] (2) to inspect and obtain samples from any person of any such wastes and samples of any containers or labeling for such wastes." In addition, the Administrator (or such officer or employee) may request such person to furnish records relating to such waste for inspection and/or copying.

Information may not be withheld from the Administrator or his authorized representative because it is confidential. However, when requested to do so, the Administrator is required to consider information to be confidential and to treat it accordingly if disclosure would divulge methods or processes entitled to protection as trade secrets. EPA regulations concerning confidentiality of business information are contained in 40 CFR Part 2, Subpart B (42 FR 36902-36924, September 1, 1976), as amended by 43 FR 39997 (September 8, 1978). These regulations provide that a business may, if it desires, assert a business confidentiality claim covering part or all of the information furnished to EPA. The manner of asserting such claims is specified in 40 CFR § 2.203 (b). Information covered by such a claim will be treated by the Agency in accordance with the procedures set forth in the Subpart B regulations. In the event that a request is made for release of information covered by a claim of confidentiality or if the Agency otherwise decides to make a determination whether or not such information is entitled to confidential treatment, notice will be provided to the business which furnished the information. No information will be disclosed by EPA when a claim of confidentiality has been made except to the extent and in accordance with 40 CFR Part 2, Subpart B. However, if no claim of confidentiality is made when information is furnished to EPA, the information may be made available to the public without notice to the business.

At a later date, EPA may request that you substantiate any claim you have made that information is confidential. Therefore, we encourage you to consult 40 CFR § 2.208 and to claim as confidential only those items that you truly believe satisfy the criteria for confidentiality.

Effluent data (as defined in 40 CFR § 2.302 (s)(2)) may not be considered by EPA as confidential. In addition, any information may be disclosed to other officers, employees or authorized representatives of the United States concerned with carrying out the Clean Water Act or RCRA or when relevant in any proceeding under those statutes.

ATTACHMENT B

NOTICE OF INTENT TO TRANSFER CONFIDENTIAL INFORMATION TO SELECTED EPA CONTRACTORS

The Environmental Protection Agency (EPA or the Agency) intends to grant access to confidential information collected under Section 308 of the Clean Water Act to selected EPA contractors.

In accordance with 40 CFR § 2.302 (h)(2-3), EPA may allow those contractors identified below access to all data (including data claimed to be confidential) collected from selected field sampling and analysis surveys of in-plant and end-of-pipe wastewater within the Coastal Oil and Gas Industry, which the Agency plans to conduct under the authority of Section 308, as well as any follow-up communications and submissions that the Agency may receive. This data will provide fundamental information about plant size and location, wastewater treatment systems, wastewater volume, production processes, solid waste disposal, and cost of treatment and disposal. This information will assist the contractors in analyzing, revising, and reviewing the technical and economic data base which supports effluent limitations and standards and NPDES permits required by the Clean Water Act.

The Agency has awarded a prime contract to Science Applications International Corporation (SAIC) of McLean, VA (Contract No. 68-C0-0044), which may also subcontract certain sampling activities to Radian Corporation of Herndon, VA. The Agency has also awarded a contract to Viar and Company of Alexandria, VA (Contract No. 68-C9-0019) for operating the Engineering and Analysis Division's Sample Control Center.

EPA has determined that it is necessary to transfer the information described above to the designated contractors in order that they may carry out the work required by their contracts. The contracts contain all confidentiality provisions required by the EPA's confidentiality regulations (see 40 CFR § 2.302 (h)(2)).

In accordance with this regulation, you are entitled to provide comments to EPA regarding this notice of contemplated disclosure. Any such comments should be submitted within 5 days of receipt of this notice to:

Ms. Allison Wiedeman
Engineering and Analysis Division (WH-552)
U.S. Environmental Protection Agency
401 M. St. S.W.
Washington, DC 20460



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

47 17

OFFICE OF
WATER

Ms. Nancy Sahr
Oryx Energy Company
P.O. 2880
Dallas, TX 75221-2880

Dear Ms. Sahr:

As discussed between yourself and Mr. Ryan Childs of my staff, the EPA is requesting your company's participation in the Engineering and Analysis Division's data collection efforts.

The Clean Water Act of 1977, as amended, requires the Environmental Protection Agency (EPA) to publish wastewater effluent limitations guidelines and standards for various industries. Published by industrial categories, these guidelines and standards are the basis for permit requirements controlling the discharge of pollutants either into navigable waters or to publicly-owned treatment works (POTW). EPA is currently developing regulations for the Coastal Subcategory of the Oil and Gas Industry.

The Engineering and Analysis Division (EAD) is collecting information on facility waste stream characteristics, facility operation, and facility waste management practices in order to develop regulations for the Coastal Oil and Gas Industry. This information is being obtained by surveying coastal oil and gas facilities and sampling selected waste streams. EPA is authorized by Section 308 of the Clean Water Act to request a facility's participation in the Agency's field investigation program. It is important to note that this effort is not for an EPA assessment of compliance with existing permits.

A sampling visit has been tentatively scheduled at your Chacahoula Field facility in Lafourche Parish for Tuesday, May 12. During this visit, Mr. Childs will be glad to describe the Coastal Oil and Gas rulemaking project, outline the overall project objectives and schedule, and discuss sampling activities. As part of the sampling visit, we will appreciate the opportunity to speak with your operations manager in order to obtain technical and cost information regarding produced water treatment and disposal.

As discussed in Mr. Childs' telephone conversation with you, we intend to sample certain waste streams associated with produced water treatment prior to injection. In particular, we would like to obtain grab samples of the produced water prior to injection. The samples will be shipped to EPA contractor laboratories to be analyzed for various analytes including radioactivity, metals, and organic compounds. We envision the sampling of the produced water to consist of grab samples collected every hour over an eight hour time period. For your information, we will provide you a generic sampling plan which describes EPA's objectives and activities in this effort. This will be sent to you, along with additional logistical details pertaining to your site, prior to the sampling visit.

I have enclosed a statement that explains your obligations under Section 308 and the legal rights to the protection of confidential information (Attachment A). If you believe the information obtained by analyzing wastewater samples or any other information that you provide is confidential, you should follow the confidential claim procedure discussed in the enclosed statement. Attachment B is a statement explaining our intention to allow selected contractors access to any confidential information you may submit in response to this request. As also noted in Attachment B, if you wish to comment on this intention, any such comment should be submitted to Ms. Allison Wiedeman, the Coastal Oil and Gas project officer on my staff, at the address below within 5 days of this notice.

Ms. Allison Wiedeman
Engineering and Analysis Division (WH-552)
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

We greatly appreciate your cooperation on this project. Should you have any questions about our study, please contact Allison Wiedeman at (202) 250-7179 or Ryan Childs at (202) 260-7035.

Sincerely yours,



Thomas O'Farrell, Director
Engineering and Analysis Division

Enclosures

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